

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

SEP 6 2005

BL

Michael N. Milby, Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD A. CAUSEY, JEFFREY K.
SKILLING, and KENNETH L. LAY,

Defendants.

Crim. No. H-04-25 (Lake, J.)

FILED UNDER SEAL

**DEFENDANTS' JOINT LIST OF WITNESSES TO BE ADMONISHED BY
THE COURT TO FACILITATE DEFENSE ACCESS TO WITNESSES**

Pursuant to the Court's instruction at last week's status conference, identified below are key witnesses in this case who have refused to meet with defendants or agree to testify at trial and whom defendants seek to subpoena to receive an admonition from the Court pursuant to the procedure outlined in defendants' filing of Friday, September 2, 2005. These do not represent all such witnesses; defendants reserve the right to augment this list. Witnesses who have pled guilty and have entered into agreements with the Task Force are denoted by an asterisk ("*"). Ben Glisan has pled guilty and is cooperating with the government, although defendants do not know if he has a written agreement with the Task Force. Defendants will ask the Task Force if it has an agreement with Mr. Glisan. With respect to the balance of the witnesses below, defendants intend to ask the Task Force to identify each witness who has entered into a cooperation agreement, non-prosecution agreement, or proffer letter or who is otherwise cooperating with the Task Force.

The witnesses are as follows, listed in alphabetical order:

Kate Agnew

Michael Anderson

David Barbarian

Kelly Boots

Ray Bowen
William Brown
Robert Butts
Richard Buy
Wes Colwell
Joseph Deffner
David Delaine*
Timothy DeSpain*
Janet Dietrich
David Duncan*
Rodney Faldyn
Andrew Fastow*
Ben Glisan*
Mark Haedicke
Kevin Hannon*
Georgeanne Hodges
James Hughes
Mark Koenig*
Michael Kopper*
Lawrence Lawyer*
Jeffrey McMahon
Jordan Mintz
Lou Pai
Mark A. Palmer
Mark S. Palmer (testified in EBS trial for defense, but subject to warnings from Task Force)
Andrea Reed
Ken Rice*
Paula Rieker*
Rex Rogers
Ian Schottlaender
Ryan Siurek

Wade Stubblefield

J.R. Sult

Greg Whalley

Dated: September 6, 2005

Respectfully submitted,

By: Daniel M. Petrocelli by permission
Ronald G. Woods

Of Counsel:

Ronald G. Woods
Texas State Bar No. 21964000
Federal Bar No. 657
5300 Memorial, Suite 1000
Houston, TX 77007
Office: 713-862-9600
Facsimile: 713-864-8738

Daniel M. Petrocelli
M. Randall Oppenheimer
Mark Holscher
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067
Office: (310) 553-6700
Facsimile: (310) 246-6779
Attorneys in Charge for Jeffrey K. Skilling

By: Michael Ramsey by permission
Ronald G. Woods

Michael Ramsey
Chip Lewis
River Oaks/Welch Building
2120 Welch
Houston, TX 77019
Office: (713) 227-0275
Facsimile: (713) 523-7887
Attorneys in Charge for Kenneth L. Lay

By: Reid Weingarten by permission
Ronald G. Woods

Reid Weingarten
Mark Hulkower
Matt Stennes
STEPTOE & JOHNSON
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036-1795
Office: (202) 429-8074
Facsimile: (202) 261-0648
Attorneys in Charge for Richard A. Causey

CERTIFICATE OF SERVICE

This is to verify that true and correct copies of the following document (Defendants' Joint List of Witnesses to be Admonished by the Court to Facilitate Defense Access to Witnesses) has been served on this 6th day of September, 2005 on counsel listed below.



Ronald G. Woods

Sean Berkowitz
John Hueston
Kathy Ruemmler
Enron Task Force
DOJ Criminal Division
1400 New York Avenue, NW
10th Floor
Washington, D.C. 20530
Facsimile: (202) 353-3165
Enron Task Force

Reid Weingarten
Mark Hulkower
Matthew Stennes
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, NW
Washington D.C. 20036
Facsimile: (202) 429-3902
Counsel for Richard Causey

Michael Ramsey
Chip Lewis
River Oaks/Welch Building
2120 Welch
Houston, Texas 77019
Facsimile: (713) 523-7887
Counsel for Kenneth L. Lay